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Attorneys for
VICTOR ALVARADO

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

| | | |
|---------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA, |) | No. CR. S-11-054 GEB |
| |) | |
| Plaintiff, |) | |
| |) | STIPULATION TO CONTINUE STATUS |
| v. |) | CONFERENCE AND EXCLUDE TIME |
| |) | UNDER SPEEDY TRIAL ACT |
| MICHAEL BOLDEN, et al., |) | |
| |) | |
| Defendants. |) | |

IT IS HEREBY STIPULATED AND AGREED between the defendants, Michael Bolden, Christopher Jackson, Victor Alvarado, Erica Arceo, and Nicholo Arceo, by and through their undersigned defense counsel, and the United States of America by and through its counsel, Assistant U.S. Attorney Matthew Segal, that the status conference presently set for January 13, 2012 at 9:00 a.m., should be continued to April 20, 2012 at 9:00 a.m., and that time under the Speedy Trial Act should be excluded from January 13, 2012 through April 20, 2012.

The reason for the continuance is that the defendants need additional time to diligently continue their investigation and preparation of the matter for trial. 18 U.S.C. § 3161(h)(7)(B)(iv). There is substantial discovery and the issues are complicated. The government represents that its evidence includes over one hundred interview memoranda and over fifteen boxes of documents. Counsel for all parties met at the FBI on October 13, 2011 to view the evidence and develop a reasonable plan for the defense to access the discovery and obtain copies, in a mutually agreeable format, of what documents are relevant and discoverable. The Government is in the process of disclosing the discovery according to the plan and the defense intends to review and analyze it.

Accordingly, the time between January 13, 2012 and April 20, 2012 should be excluded from the Speedy Trial calculation pursuant to Title 18, United States Code, Section 3161(h)(7)(B)(iv) and Local Code T-4 for defense preparation. The parties stipulate that the ends of justice served by granting this continuance outweigh the best interests of the public and the defendants in a speedy trial. 18 U.S.C. §3161(h)(7)(A). Mr. Segal and the undersigned defense counsel have authorized Mr. Locke to sign this pleading for them.

DATED: January 10, 2012

/S/ Bruce Locke
BRUCE LOCKE
Attorney for Victor Alvarado

DATED: January 10, 2012

/S/ Bruce Locke
For DOUGLAS BEEVERS
Attorney for Christopher Jackson

DATED: January 10, 2012

/S/ Bruce Locke
For TIM WARRINER
Attorney for Michael Bolden

DATED: January 10, 2012

/S/ Bruce Locke
For MICHAEL CHASTAINE
Attorney for Erica Arceo

DATED: January 10, 2012

/S/ Bruce Locke
For JAY TONEY
Attorney for Nicholo Arceo

DATED: January 10, 2012

/S/ Bruce Locke
For MATT SEGAL
Attorney for the United States

The Court finds that the ends of justice served by granting this continuance outweigh the best interests of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

Dated: January 10, 2012



GARLAND E. BURRELL, JR.
United States District Judge